

Tom A. Howley, State Bar No. 24010115
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
Telephone: (832) 239-3939
tahowley@jonesday.com

Brad B. Erens (admitted *pro hac vice*)
Joseph A. Florczak (admitted *pro hac vice*)
JONES DAY
77 West Wacker
Chicago, Illinois 60601
Telephone: (312) 782-3939
bberens@jonesday.com
jflorczak@jonesday.com

PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Jointly Administered
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

NOTICE OF RESCHEDULED HEARING

PLEASE TAKE NOTICE that the hearing regarding the Debtors' Motion for Entry of an Order (I) Authorizing the Retention and Employment of AP Services, LLC and (II) Designating Rebecca A. Roof as Chief Restructuring Officer *Nunc Pro Tunc* to April 30, 2015 (the "AP Services Application") [Docket No. 79], previously noticed and scheduled for hearing (the "AP Services Hearing") on June 1, 2015 [Docket No. 80] has been rescheduled.

PLEASE TAKE FURTHER NOTICE, that the AP Services Hearing will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **June 9, 2015 at 11:00 a.m. (CDT)**, or at such other time as the court may determine.

PLEASE TAKE FURTHER NOTICE that any objections or other responses to the AP Services Application (an "Objection") must be filed on or before **June 2, 2015** (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve the Objection upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61] so that such Objection is received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that any replies to an Objection (a "Reply") must be filed on or before **June 5, 2015** (the "Reply Deadline"). At the same time, you must serve the Reply upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61] so that such Reply is received by the Reply Deadline.

Dated: May 29, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

Tom A. Howley
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
Telephone: (832) 239-3939
tahowley@jonesday.com

Brad B. Erens
Joseph A. Florczak
JONES DAY
77 West Wacker
Chicago, Illinois 60601
Telephone: (312) 782-3939
bberens@jonesday.com
jflorczak@jonesday.com

PROPOSED ATTORNEYS FOR DEBTORS